

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

RICHARD L. RIVERA QUINONES

Debtor(s)

CASE NO. 07-02538 SEK

CHAPTER 7

APPLICATION FOR LEAVE TO EMPLOY REALTOR  
PURSUANT TO RULE 2014 OF THE  
FEDERAL RULES OF BANKRUPTCY PROCEDURE

TO THE HONORABLE COURT:

COMES NOW, **Wilfredo Segarra Miranda**, Trustee in the present case, who respectfully states and prays relief as follows:

1. Applicant is the duly appointed trustee in the above-captioned proceeding.
2. The undersigned trustee seeks to employ realtors **Zunilda Cabrera Jiménez**, license number 304 and **Pedro Betancourt Diaz**, license number 8416, to procure the sale of a real property pertaining to the herein estate.
3. In the undersigned trustee's best business judgment, aggressive marketing efforts, as those agreed and to be provided by **Zunilda Cabrera Jiménez and Pedro Betancourt Diaz**, may yield a feasible offer and realizable value for these properties within the valuation estimates obtained as of this date.
4. Within the services to be provided, **Zunilda Cabrera Jiménez and Pedro Betancourt Diaz** should be in charge of all selling and marketing efforts and will conduct the sale of the properties in accordance with the notice of sale filed and noticed to all creditors and parties in interest.

5. To the best of the trustee's knowledge, the realtors whose employment is sought have no connection with the undersigned trustee, the Debtor, the creditors, any parties in interest, their respective attorneys or accountants, and the office of the US Trustee or any person employed by said office
6. Your trustee further believes that in the discharge of its duties the firm will not represent or hold any interest adverse to the herein estate and will be a disinterested person as defined in 11 U.S.C. §101(14) & §327.
7. The proposed realtors will be paid for its services as follows:
  - a. **Zunilda Cabrera Jiménez and Pedro Betancourt Diaz** will receive a real estate broker commission at the rate of 4% of the gross sales price on the private offers and sales procured by his services. This commission is to be paid by the estate, after notice hearing and allowance by the Court.
  - b. Any forfeited commission will be shared fifty per cent to the estate and fifty per cent to the realtors. This commission is to be paid by the estate from the forfeited moneys, after notice hearing and allowance by the Court.

**NOTICE IS HEREBY GIVEN** that, unless a written objection is filed in Court, within ten (10) days of this Notice, the Court may enter an Order granting the application for employment of these realtors without the need of a hearing.

**WHEREFORE**, undersigned Chapter 7 Trustee hereby requests the entry of an Order granting leave to employ **Zunilda Cabrera Jiménez and Pedro Betancourt Diaz**, to act as Realtors for the Trustee in the present Chapter 7 proceeding on the terms detailed herein.

**CERTIFICATE OF SERVICE:** I HEREBY CERTIFY THAT on the same date a true copy of this motion has been sent to the **US Trustee Office** at Ochoa Building, 500 Tanca Street, Suite 301, Old San Juan, Puerto Rico 00901-1922 and to all other creditors and parties in interest included in the attached master address list.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 19<sup>th</sup> day of December, 2008.

/s/wilfredo segarra miranda  
**WILFREDO SEGARRA MIRANDA**  
**CHAPTER 7 TRUSTEE**  
**PO Box 9023385**  
**San Juan, PR 00902-338**  
**Tel. (787) 725-6160**  
**Fax (787) 977-2288**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:**

**RICHARD L. RIVERA QUINONES**

**Debtor(s)**

**CASE NO. 07-02538 SEK**

**CHAPTER 7**

**VERIFIED DECLARATION UNDER PENALTY OF PERJURY**

**TO THE HONORABLE COURT:**

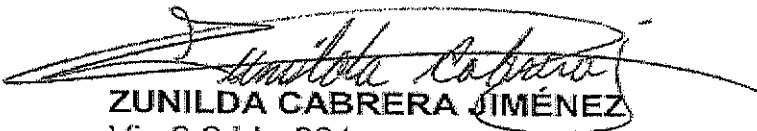
We, Zunilda Cabrera Jiménez, license number 304, and Pedro Betancourt Diaz, license 8416, declare under penalty of perjury as follows:

1. We are a Realtors duly authorized to exercise our professions of Realtors by the laws of the Commonwealth of Puerto Rico. The exercise of said licenses have in no way been restricted or limited.
2. We maintain offices at #140 Vereda St., Paseo del Prado, Carolina, Puerto Rico, 00987, telephone 787-547-6521; 787-547-6514.
3. Prior to the date of the applicants engagement as realtor, we had no connections with debtor, debtor's attorney, creditor, US Trustee, Chapter 7 Trustee or any other party in interest.
4. That to the best of our knowledge and belief, we are "disinterested persons" as per Section 101(14) of the Bankruptcy Code, which definition is incorporated herein by reference, and we do not have any connection to any creditor or debtor in this case, nor any party in interest herein, nor anyone acting on their behalf whose interest may be adverse to debtor's estate, and we do not represent or hold any interest adverse to the debtor or to the estate,

with respect to the matter on which it is to be employed as counsel, pursuant to 11 U.S.C. §327(a).

5. We have not received or been promised transfer, assignment, pledge of property of the debtor or the estate, except as for compensation as set forth herein to be made at no more of 4% of the gross sales price.
6. I have not agreed to share with any person, except members of my Firm, the compensation to be paid for the services rendered in this case.
7. The terms of compensation agreed to are as follows: no more of 4% of the gross sales price.
8. I will amend this statement immediately upon my learning that: (a) any of the representations made herein are incorrect, or (b) there is any change of circumstance relating thereto.
9. I have reviewed the provisions of LBR 2016-1.

**In San Juan, Puerto Rico, this 19<sup>th</sup> day of December, 2008.**



**ZUNILDA CABRERA JIMÉNEZ**  
Via 9 2 LL, 331  
Villa Fontana  
Carolina, Puerto Rico  
Tel. (787) 547-6514  
Fax (787) 750-8818



**PEDRO BETANCOURT DIAZ**  
Via 9 2 LL, 331  
Villa Fontana  
Carolina, Puerto Rico  
Tel. (787) 547-6521  
Fax (787) 750-8818

Calle Vereda 140 Phone: 787.547.6521  
Paseo del Prado, Fax: 787.750.8818  
Carolina, PR 00987 Email: zuped@hotmail.com

## **Pedro Betancourt Díaz**

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<b>Experience</b>	1999–2001	Eagle Realty	Carolina, PR
	<b>Real Estate Broker</b>		
	Since 2001	BC Properties	Carolina, PR
	<b>President</b>		

<b>Education</b>	<b>Instituto de Banca y Comercio</b> 1994 Restaurant administration
	<b>San Juan Board of Realtors</b> 1998 Real Estate Broker Course (Lic. 8416)

### **Related education**

**Instituto Prof. José R. Faría** 2000  
Regulations 10 Law Course  
Ethics Regulations Course

**San Juan Board of Realtors**  
Documentation for closing and legal aspects Course

**San Juan Board of Realtors** 2002  
Valuation Analysis Course

**Instituto Prof. José R. Faría** 2003  
Mathematics for Real Estates Course  
Sales Techniques Course  
Mortgage Financing Course

**San Juan Board of Realtors**  
Financing of commercial properties Course

**San Juan Board of Realtors** 2004  
Legal Aspects Course  
Mortgage Financing Course  
**Venta de Propiedades Bajo Ley de Quiebra** Course

**San Juan Board of Realtors** 2005  
**Ventas de Propiedades Reposeidas** Course

**Instituto de Realtors de Puerto Rico 2006**  
New apartment valuation and valuation analysis Course

**San Juan Board of Realtors**  
Sales Techniques Course

**Instituto de Realtors de Puerto Rico 2007**  
Regulations **10 Law** Course  
**Venta de Propiedades Fuera de Puerto Rico** Course  
Mathematics for Real Estates Course

**Asociación de Realtors**  
Computers Techniques for Real Estates Course

Calle Vereda 140 Phone: 787.547.6514  
Paseo del Prado, Carolina Fax: 787.750.8818  
PR, 00987 Email: zuped@hotmail.com

## **Zunilda Cabrera Jiménez**

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**Experience** 1999–2001 Eagle Realty Carolina, PR  
**Real Estate Broker**

Since 2001 BC Properties Carolina, PR  
**Vice President**

**Education** Nuestra Señora de los Ángeles Custodios School, R.D. 1985  
Commercials Studies

Escuela de Arte Ofelia Dacosta Inc. 1989  
Dramatic Arts

Ateneo Puertorriqueño 1990  
Drama Principles

San Juan Board of Realtors 1998  
Real Estate Broker Course (Lic. 304)

### **Related education**

Instituto Prof. José R. Faría 2000  
Regulations 10 Law Course  
Ethics Regulations Course  
Mathematics for Real Estates Course  
Sales Techniques Course

San Juan Boards of Realtor 2002  
Ethics Regulations Course  
Congress Housing Course

San Juan Boards of Realtor 2004  
Mortgage Financing Course  
Venta de Propiedades Bajo Ley de Quiebra Course

San Juan Boards of Realtor 2005  
Ventas de Propiedades Reposeidas Course

The Center for Professional Advancement  
Pre Reginner's Conversational English 1



**Instituto INDEPOCAHU**  
**Crecimiento para el desarrollo humano**

**San Juan Boards of Realtor 2006**  
New apartment valuation and valuation analysis Course  
Sales Techniques Course

**The Center for Professional Advancement**  
Pre-Reginner's Conversational English II

**San Juan Seminar Real Estate, Inc. 2007**  
Credit Store, Credit Report and How to Protect it Course

**Asociación de Realtors**  
Computers Techniques for Real Estates Course